

# **EXHIBIT 20**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF NEW JERSEY  
3           IN RE JOHNSON & JOHNSON                   §  
4           TALCUM POWDER PRODUCTS               § MDL NO.:  
5           MARKETING, SALES                       §  
6           PRACTICES, AND PRODUCTS           § 16-2738(MAS)(RLS)  
7           LIABILITY LITIGATION               §

8                   \*\*\*\*\*  
9                   REMOTE VIDEOCONFERENCED DEPOSITION OF  
10                   LAURA MASSEY PLUNKETT, PH.D.  
11                   DECEMBER 21, 2023  
12                   \*\*\*\*\*

1 some of those exist. And because I've heard them  
2 discussed just kind of, you know, in conversation.  
3 But I have not, no. I -- there's a -- from my  
4 understanding of what's there, there is some  
5 literature that causation experts rely upon that is  
6 post 2021.

7 Q. And without disclosing any conversation  
8 you've had with counsel, what articles are you aware  
9 of that exist?

10 A. I don't know the name of the article. I  
11 just happen to know that there -- in conversations  
12 I've had that there is some additional literature in  
13 this area.

14 Q. Same question as to heavy metals: Have  
15 you found any articles since August of 2021 that  
16 you've not seen before concerning heavy metal  
17 exposure and risk of cancer?

18 A. No. And on the heavy metals and actually  
19 on the asbestos as well, don't forget that in my  
20 discussion of my opinions, the issue is having  
21 exposure to the entire mixture, not just to one  
22 particular constituent.

23 So the epidemiological literature  
24 related to perineal use of talc, it's talc with all  
25 the things in it. And the asbestos literature is